

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

<b>ANTHONY CASTILLO SANCHEZ,</b>	)	
	)	
<b>Petitioner,</b>	)	
	)	
<b>v.</b>	)	
	)	
	)	<b>Case No. CIV-10-1141-HE</b>
<b>MIKE CARPENTER, Interim Warden,</b>	)	
<b>Oklahoma State Penitentiary,</b>	)	
	)	
<b>Respondent.</b>	)	

**PETITIONER’S MOTION TO PRESENT REQUEST  
FOR CLEMENCY BUDGET EX PARTE AND TO FILE  
UNDER SEAL; BRIEF IN SUPPORT**

Petitioner Anthony Castillo Sanchez, through counsel, requests an order permitting Mr. Sanchez’s motion for a clemency budget to be filed under seal and considered ex parte.

As grounds for this motion, Petitioner states that confidentiality is appropriate when the proposed motion would require the disclosure of work product. 18 U.S.C. § 3599(f).

A motion for clemency budget necessarily involves disclosure of confidential litigation plans.

Mr. Sanchez’s habeas appeal has been denied by the Tenth Circuit and

certiorari has been denied by the Supreme Court of the United States. Thus, the case is ripe for preparation of a clemency case.

Respectfully submitted,

s/ Mark Barrett

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### **CERTIFICATE OF SERVICE**

I certify that on this 23<sup>rd</sup> day of October, 2018, I electronically transmitted the attached document to the Clerk of Court using the ECF system for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to Assistant Attorney General Jennifer L. Crabb, whose email address is [fhc.docket@oag.ok.gov](mailto:fhc.docket@oag.ok.gov).

/s/ Mark Barrett

MARK BARRETT